

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

UNITED STATES DISTRICT COURT  
For The  
NORTHERN DISTRICT OF TEXAS

2014 OCT -1 PM 4:47

DEPUTY CLERK

**3-14 CV-3563M**

VICTOR SHORT, SR.  
Plaintiff's

§

IN THE DISTRICT  
COURT

§

~~191 JUDICIAL COURT~~

vs.

§

DALLAS COUNTY, TEXAS

C.R. ENGLAND GLOBAL, INC.  
Respondent,

§

PETITION'S APPLICATION  
NATIONAL LABOR RELATIONS ACT

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**1989 'WHISTLE-BLOWERS' ACT RETALIATION**

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[RE: NLR [29, U.S.C. § 160 (c)].

Subj: TITLE VII OF CIVIL RIGHTS ACT 1964

Plaintiff's Victor Short, Sr. has filed AMVETS' Presuppose Section 1. And,  
1986 Equal Back Pay Act of 'aggrieved age discrimination status for [42, U.S.C.A. §1981.  
Scope of Relief: The factual issue raised around the validity retaliation citation and C.R. England, Inc.  
Motives for racial drug profiling remain unresolved by C.R. England, Inc. Response and demonstrates  
Potential for Prima facie case opportunity an established trial. *See, e.g. Marks v. Prattco, Inc.* 607, 1153,  
1155 (5<sup>th</sup> CIR.1979). Court held that Prima facie case of 'Wrongful Discharged' may be made out by  
Showing the Plaintiff's (1) is a protected minority; (2) qualified for company employment for which he's  
Denied First Amendment Freedom of speech. *Note, Kingsley R. Brownie*, 27 OHIO N.U.L. Rev. (2001).  
[42, U.S.C. § 2000e.

[Page2: TITLE VII HEARNING BRIEF

Plaintiff's Victor Short, Sr. has charged on which he is released to C.R. England, Inc. Burns Harbor, IN' is the last line of low balling AMVETRS' and out sourcing in violation of 'Whistle-Blower' Act from trainer Julia Jones, Abuse of Power and racism with emphasis eating out of The Iron Skillet and disparity of restroom denial restrooms for excess 32, and 26 miles during the most recent trip From: C.R. England, Inc. Laredo, TX' via Allentown, PA. Through Effingham, IN'.

Shamelessly, she would invoke coincidence to achieve ironic effects and cast the dye and false Untrue statements "Quote", that Guy Victor Short's a trouble maker and a bad apple for the company Influence to: both Laredo, dispatchers and staff members' Alfredo, 31 July-August 2014. Note, In an Employment-based dispute, reinstatement is an accepted measure to accompany back pay as part of the Over all remedy. *See, e.g. United States v. City of Jackson, Mississippi*, 519 F.2d 1147 (5<sup>th</sup> Cir. 1975). Reinstatement is routine remedy for wrongful discharge in Industrial employment case. National Labor Relations Act 29 U.S.C. § 160 (c ).

Upon arrival Julia Jones, was taken "out of Service" for Trainer road test, and DOT Physicals. More important, she implemented a sugar and drug screen then orders me off her truck to Burns Harbor. Case and Point, for ordering me to report to: may have been participated from my refusal to join their Sleeper team for additional 90-days for her fiancé Lease operations as well as Davis's Heavy-Duty Equipment cross Country escort services. Secondly, I suggest and warn her of the dangers of driving With possibility of exhaust fumes and any four Batteries leaking in the cabin area. And these events Promoted a huge headache. I don't know if she recorded statements. But, I also indicated as of Dec. 12, 2012 I completed my phase II training with 27,000, miles from Ms. Shanna Good in, Driver Code: GOSHRA, Salt Lake City, UT. My references are Impeccable, Victor Martinez, Jerri Speed, George Price, Theresa Harvey, and former: C.R. England, Inc. Graduate Gary McGowan, speaks volumes. Even more, Plaintiff's Victor Short, Sr. further describes a pattern of abuse of power with other Nationalist from Africa, to their style of procurement's for their own financial gain and profit.

[Page3: TITLE VII HEARNING BRIEF

Coverage of Relief: C.R. England, Inc. also has a Zero Tolerance and Public Policy which supports First Amendment TITLE VII Regulation of company employment freedom of speech.

Sub Part B- Contractors Agreement See.202, "(1) the contractor will not discriminate against any Employee, /or: applicant for employment because of his race, color, religion, sex or national origin.

Exhibit's 'A' Plaintiff's Victor Short, Sr. has concurrent Analytical Labs results dated October 2011.

2012. / Apr.18, / Jun, / Jul. 18, and August 18, 2014. I've Passed all MED TOXICOLOGY

LABORATORIES Address 402 West County Road-D St. Paul, MN 55112 /Specimen Id. #

YANKEE 30482955, FOLLOWING LOCATIONS' (1) C.R. England, Inc. Mira Loma, CA.

(2) Salt Lake City, UT. (3) Burns Harbor, IN'. (4) 230 Highway-67, South Cedar Hill, TX 75104

Attention: DR. Michael Loftus, M.D.

Exhibit's 'B' Methods and Material: Interrogatories may be furnished upon request.

Examples of Discovery: Driver Codes, Trip Pax, and Driver Logs'

VICSHO, / MATJES, / BROSTE, / DAVCHA, / GOSHRA, / JOSLLO, / SKENVN,

EXECUTIVE ORDERS NO. # 11246

The contractor will comply with the all the provision of the Order No. # 11246, of Sept 24, 1965.

And, any rules regulation and relevant Orders of the Secretary of Labor.

Plaintiff's Victor Short, Sr. entitlements consist of over 24 months vestige services for 1986 ADA,

Equal Back Pay Act of 1966. Piercing the shield of Federal Sovereign Immunity for TITLE VII

Interest Awards *Note, 91 COLUM L.Rev.* 63 (1899).

Plaintiff's Victor Short, Sr. has also prevailed the court respectfully seeks a jury trial.

And, grants punitive damages awards of three time amount inaction for violators of Civil Rights

@ U.S. INDEX RATE OF 15% of the Market Shares.

[42, U.S.C. § 2000a.

CW *[Signature]* Sr., 10/01/14

C/O: AMVETS' U.S. [38, CFR§1601. (Military Orders of the Purple Hearts.) ACT

951 BROOKE FOREST DR.

DALLAS, TX 75253

(972) 802-0831

## CIVIL COVER SHEET

The JS 44 civil coversheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers required by the Federal Rules of Civil Procedure, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

(b) County of Residence of First Listed Plaintiff VICTOR SHORT JR.  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)  
Pro Se.

## DEFENDANTS

County of Residence of First Listed Defendant C. R. England, Inc.  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff  
☒ 3 Federal Question (U.S. Government Not a Party)  
☐ 2 U.S. Government Defendant  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   |                                       |                            |   |                            |                            |
|---|---------------------------------------|----------------------------|---|----------------------------|----------------------------|
|   | PTF                                   | DEF                        |   | PTF                        | DEF                        |
| Citizen of This State                   | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2            | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3            | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutional of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee (Prisoner Petition) <input type="checkbox"/> 465 Other Immigration Actions		

## V. ORIGIN

(Place an "X" in One Box Only)

- ☐ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from another district (specify)  
☒ 6 Multidistrict Litigation

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 29 U.S.C. § 160 (c).

Brief description of cause:

TITLE VII CIVIL RIGHTS ACT

## VII. REQUESTED IN COMPLAINT:

☒ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

## DEMANDS

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S)

PENDING OR CLOSED:

(See instructions):

JUDGE

DOCKET NUMBER

DATE

Oct 1st 2014

SIGNATURE OF ATTORNEY OF RECORD

CW Taylor Hart Sr.

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

## INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

### Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

**I. (a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

**II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.

Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

**III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

**IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerks in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.

**V. Origin.** Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

**VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.**  
Example: U.S. Civil Statute: 47 USC 553  
Brief Description: Unauthorized reception of cable service

**VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

**VIII. Related Cases.** This section of the JS 44 is used to reference cases that are related to this filing, if any. If a related case exists, whether pending or closed, insert the docket numbers and the corresponding judge names for such cases. A case is "related" to this filing if the case: (1) involves some or all of the same parties and is based on the same or similar claim; (2) involves the same property, transaction, or event; (3) involves substantially similar issues of law and fact; and/or (4) involves the same estate in a bankruptcy appeal.

**Date and Attorney Signature.** Date and sign the civil cover sheet.